

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: DANIEL O. DAILEY, SR.	:	CHAPTER 13
	:	
Debtors.	:	18-04700-RNO
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KEYBANK, N.A.,	:	
	:	
Movant,	:	
	:	
v.	:	11 U.S.C. §362
	:	
DANIEL O. DAILEY, SR. and	:	
CHARLES J. DEHART, III, ESQUIRE	:	
	:	
Respondents	:	

**ANSWER TO MOVANT’S MOTION FOR RELIEF**

AND NOW, comes the Debtor, Daniel O. Dailey Sr., by and through his Attorney, Patrick J.

Best, of ARM Lawyers, who hereby answers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that this is a request for relief; denied that relief should be granted.
6. Denied. Debtor’s Chapter 13 Plan proposes to pay the entire loan balance. As such, no post-petition payments were due.
7. Admitted.
8. Admitted.
9. Denied. Movant alleges value of \$70,000 and a lien of \$12,114.91. Using Movant’s alleged value, there is significant equity which results in adequate protection.
10. Admit.

11. Denied. As the entire loan is to be paid through the Plan, co-debtor stay is inappropriate.

**WHEREFORE**, Debtors respectfully request that this Honorable Court deny Movant's Motion for Relief.

Date: March 20, 2019

/s/ Patrick J. Best  
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